

Exhibit B



Andrew Mancilla <andrew@law-mf.com>

Summary of the May 30th Meet and Confer

Harris Katz <katz.h@wssllp.com>

Fri, Jun 7, 2019 at 3:10 PM

To: "Michael H. Schaalman" <mhs@hallingcayo.com>, "Robert Fantone, Esq." <robert@law-mf.com>, "Tracy P. Hoskinson" <tracy.hoskinson@kennedyscmk.com>, "Dain, Anthony J." <anthony.dain@procopio.com>, Andrew Mancilla <andrew@law-mf.com>
Cc: "Sharan R. Abraham" <sharanrabraham@gmail.com>, "Brad S. Grayson" <bgrayson@straussmalk.com>

Mr. Schaalman,

With respect to your below proposal concerning the plaintiffs' second document requests to Salzman, our counterproposal is as follows:

- In response to No. 4, we will produce our client's invoices with any privileged information redacted.

The other requests are entirely overbroad and unduly burdensome, and largely (if not completely) redundant of the plaintiffs' prior requests wherein plaintiffs demanded, among other things, all documents relating to any communications with Anthony Dain, Cherie Wrigley, Melissa Cohenson, and Pamela Kerr.

Please advise as to whether our counterproposal is acceptable.

We are currently reviewing our privilege logs and will further confer with you as respects the second issue you refer to below in the near future.

This is further to confirm that we will depose Bernard Black at our office in New York (45 Broadway, 32nd Floor, NY, NY 10006) on July 8, 2019 starting at 10 a.m., and will depose Katherine Black at our office in New York on July 10, 2019 starting at 10 a.m.

Finally, we will circulate a proposed stipulation early next week to extend the deadline for defendants to serve expert reports and to extend the deadline for expert depositions. Given that Samuel Black's deposition is not being held until July 17, 2019, we propose that defendants' deadline to serve expert reports as being August 17, 2019.

Regards,

Harris B. Katz, Esq.

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From: Michael H. Schaalman [mailto:mhs@hallingcayo.com]

Sent: Tuesday, June 04, 2019 11:58 AM

To: Harris Katz; Robert Fantone, Esq.; Tracy P. Hoskinson; Dain, Anthony J.; Andrew Mancilla

Cc: Sharan R. Abraham; Brad S. Grayson

Subject: Summary of the May 30th Meet and Confer

Counsel, here is our summary of what was agreed to at the meet and confer conference on May 30th in ***Black et al. v. Dain et al., Case no. 16-cv-1238***: (1) counsel for defendants Wrigley, Pinto and CPI will confirm in writing that these defendants are not withholding any documents responsive to the Plaintiffs' First Request for Documents on the basis of privilege, work product or the doctrine of joint defense and common interest as soon as possible; (2) counsel for defendants Salzman and Cohenson and Raphan will review their privilege logs regarding to the assertion of attorney-client privilege, work product and the doctrine of joint defense and common interest over communications involving Bart Russo, Eve Markevich, attorneys for Bernard Black and court personnel and disclose to plaintiffs' counsel, as soon as possible, whether they will continue to withhold these documents ; (3) counsel for the plaintiffs will identify for defense counsel the individuals listed in the privilege logs who they do not recognize and defense counsel will identify those individuals promptly after receiving the list of these individuals; (4) plaintiffs' counsel proposed to limit the Second Request for Documents to defendant Dain by withdrawing Requests 1-3, to defendant Salzman, by withdrawing Requests 1-2, to defendant Wrigley, by withdrawing Requests 1-3, to defendants Pinto and CPI, by withdrawing Requests 1-2, and to defendants Cohenson and Raphan, by withdrawing Requests 1-2; (5) defense counsel will respond to plaintiffs' counsel proposal to limit the Second Request for Documents by June 6th and (6) counsel for defendant Salzman will promptly draft and circulate a proposed stipulation to extend the deadline for the disclosure of defendants' expert(s) report(s) and to extend discovery for expert depositions.

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Andrew Mancilla <andrew@law-mf.com>

Summary of the May 30th Meet and Confer

Andrew Mancilla <andrew@law-mf.com>

Fri, Jun 7, 2019 at 9:38 PM

To: "Michael H. Schaalman" <mhs@hallingcayo.com>

Cc: "Michael H. Schaalman" <mhs@hallingcayo.com>, Harris Katz <katz.h@wssllp.com>, "Robert Fantone, Esq." <robert@law-mf.com>, "Tracy P. Hoskinson" <tracy.hoskinson@kennedyscmk.com>, "Sharan R. Abraham" <sharanrabraham@gmail.com>, "Brad S. Grayson" <bgrayson@straussmalk.com>, "Dain, Anthony J." <anthony.dain@procopio.com>

Mr. Schaalman,

Pursuant to our meet and confer telephone discussion on May 30, 2019, you proposed the following regarding the discovery dispute, as it pertains to our clients Cherie Wrigley, Esaun Pinto/CPI Investigations, Inc.:

- 1. counsel for defendants Wrigley, Pinto and CPI will confirm in writing that these defendants are not withholding any documents responsive to the Plaintiffs' First Request for Documents on the basis of privilege, work product or the doctrine of joint defense and common interest as soon as possible;*
- 2. defense counsel will respond to plaintiffs' counsel proposal to limit the Second Request for Documents - Wrigley, by withdrawing Requests 1-3, Pinto and CPI, by withdrawing Requests 1-2.*

Regarding your first request we confirm the defendants are not withholding any documents responsive to the Plaintiffs' First Request for Documents on the basis of privilege, work product or the doctrine of joint defense and common interest.

Regarding your "limited" second set of document requests, we are willing to produce contracts for professional services related to the Trusts, the Dain Actions or the Conservatorship, with redactions to protect all applicable privileges.

Regarding your Request #4 to Pinto/CPI, we object based on undue burden given your client is already in possession of responsive documents. Regarding request #5, we object to the request as over-broad and unlikely to lead to any documents relevant to the issues in this lawsuit.

Regarding requests #6 and #7 to Wrigley, we object on the grounds that they are over-broad.

Sincerely,
Andrew

On Fri, Jun 7, 2019 at 7:51 PM Dain, Anthony J. <anthony.dain@procopio.com> wrote:

Mr. Schaalman,

In keeping with Magistrate Judge Tiscione's Order that we meet and confer to "severely narrow the scope of the discovery requests." I am offering to search for and provide you with any contracts I have for legal, accounting, consulting, or other professional services related to the Trusts, the Dain Actions or the Conservatorship (using your defined terms), and redacted as necessary to protect attorney-client privilege, any other privilege and/or work product doctrine.

Best regards,

Anthony Dain

From: Michael H. Schaalman [mailto:mhs@hallingcayo.com]

Sent: Tuesday, June 04, 2019 8:58 AM

To: Harris Katz; Robert Fantone, Esq.; Tracy P. Hoskinson; Dain, Anthony J.; Andrew Mancilla

Cc: Sharan R. Abraham; Brad S. Grayson

Subject: Summary of the May 30th Meet and Confer

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Bernard Black and Katherine Black are available for their examinations between July 8th through July 10th.



Michael H. Schaalman

Halling & Cayo, S.C.

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mailgw01.procopio.com made the following annotations

Fri Jun 07 2019 16:51:49

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Andrew Mancilla <andrew@law-mf.com>

Summary of the May 30th Meet and Confer

Dain, Anthony J. <anthony.dain@procopio.com>

Fri, Jun 7, 2019 at 4:51 PM

To: "Michael H. Schaalman" <mhs@hallingcayo.com>, Harris Katz <katz.h@wssllp.com>, "Robert Fantone, Esq." <robert@law-mf.com>, "Tracy P. Hoskinson" <tracy.hoskinson@kennedyscmk.com>, Andrew Mancilla <andrew@law-mf.com>

Cc: "Sharan R. Abraham" <sharanrabraham@gmail.com>, "Brad S. Grayson" <bgrayson@straussmalk.com>

Mr. Schaalman,

In keeping with Magistrate Judge Tiscione's Order that we meet and confer to "severely narrow the scope of the discovery requests." I am offering to search for and provide you with any contracts I have for legal, accounting, consulting, or other professional services related to the Trusts, the Dain Actions or the Conservatorship (using your defined terms), and redacted as necessary to protect attorney-client privilege, any other privilege and/or work product doctrine.

Best regards,

Anthony Dain

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Sent: Tuesday, June 04, 2019 8:58 AM

To: Harris Katz; Robert Fantone, Esq.; Tracy P. Hoskinson; Dain, Anthony J.; Andrew Mancilla

Cc: Sharan R. Abraham; Brad S. Grayson

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[Quoted text hidden]

mailgw01.procopio.com made the following annotations

Fri Jun 07 2019 16:51:49

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Andrew Mancilla <andrew@law-mf.com>

Black v. Dain - Discovery Issues [KEN-Legal.FID41356467]

Tracy P. Hoskinson <Tracy.Hoskinson@kennedyslaw.com>

Fri, Jun 7, 2019 at 1:23 PM

To: "Michael H. Schaalman" <mhs@hallingcayo.com>, "Sharan R. Abraham" <sharanrabraham@gmail.com>, "bgrayson@straussmalk.com" <bgrayson@straussmalk.com>

Cc: Harris Katz <katz.h@wssllp.com>, "Dain, Anthony J." <anthony.dain@procopio.com>, Andrew Mancilla <andrew@law-mf.com>, "Robert Fantone, Esq." <robert@law-mf.com>

Mr. Schaalman,

Pursuant to our meet and confer telephone discussion on May 30, 2019, you proposed the following regarding the discovery dispute, as pertains to my clients Cohenson and Raphan:

1. Counsel for defendants Cohenson and Raphan will review their privilege logs regarding to the assertion of attorney-client privilege, work product and the doctrine of joint defense and common interest over communications involving Bart Russo, Eve Markevich, attorneys for Bernard Black and court personnel and disclose to plaintiffs' counsel, as soon as possible, whether they will continue to withhold these documents. (When asked for clarification, you noted the court personnel to be Laura Messiana, Carl Glatstein, Lee Hoffman, and Sahony Ramos). Counsel for the plaintiffs will identify for defense counsel the individuals listed in the privilege logs who they do not recognize and defense counsel will identify those individuals promptly after receiving the list of these individuals.
2. Limiting Plaintiffs' the Second Request for Documents to defendants Cohenson and Raphan, by withdrawing Requests 1-2 (of 6).

My counterproposal is as follows:

1. Regarding the privilege log:
 - We will produce communications noted in our privilege log to be with Bart Russo, as he is the only individual in your list indicated in our log.
 - We will await the list of individuals and will work with our clients to identify them to the extent they are able to, assuming we find the list to be relevant, reasonable, and not overly burdensome.
2. Regarding your Second Demand for Documents
 - In response to No. 4, we will produce our clients' billing records with any privileged information redacted.
 - In response to Nos. 5 and 6, we advise that this demand will not result in disclosure of any additional records, as our prior searches would have encompassed any such documents, should they exist.

Thanks, and have a good weekend.

Tracy P. Hoskinson

Associate

for Kennedys

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